<center>**REMARKS**</center>

In the Office Action dated November 27, 2007, claims 1-14 and 16-20 were presented for examination. Claims 1-14 and 16-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Lennon et al.*, U.S. Patent Publication No. 2002/0107973 in view of *Dickman et al.*, U.S. Patent No. 5,877,765.

Applicants wish to thank the Examiner for the careful and thorough review and action on the merits in this application.

I.   Rejection Under 35 U.S.C. §103(a)

In the Office Action dated November 27, 2007, the Examiner rejected claims 1-14 and 16-20 as being unpatentable under 35 U.S.C. §103(a) by *Lennon et al.*, U.S. Patent Publication No. 2002/0707973 in view of *Dickman et al.*, U.S. Patent No. 5,877,765.

Applicants' remarks pertaining to *Lennon et al.* and *Dickman et al.* in response to the communication of June 22, 2007 are hereby incorporated by reference.

Applicants have amended each of the independent claims to more specifically define the invention over the prior art of record. More specifically, each of the independent claims have been amended to include the element of managing a managed object, as opposed to communicating with a managed object. Applicants' invention teaches a user interface system for managing one or more managed objects. The managed objects include elements such as disk arrays, routers, etc. Furthermore, Applicants teach and claim at least three internal commands, *i.e.* GET, INVOKE, and SET, that are employed as management commands of the managed objects.

The Examiner employs *Lennon et al.* as a prior art references to support communication between a user and a managed object. *Lennon et al.* teaches a computer system that enables a user to browse and search metadata collections. The Examiner argues that *Lennon et al.* teaches modifying existing data, see paragraph 0170 of *Lennon et al.* After careful review it is clear that the value mentioned for modification is set by the metadata server and not by the user. However, Applicants' claim 1 specifically claims that the management of the object is through an operator input command, *i.e.* by a user, not by a server. Furthermore, *Lennon et al.* does not teach creation of new data associated with the managed object. The Examiner cites *Lennon et al.* to support a procedure to satisfy a browsing request. However, the procedure for support of the

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browsing request does not imply creation of new data by a user. The user merely sends a browsing request to the metadata server. The system of *Lennon et al.* is similar to the systems of Amazon and iTunes. According to the specification of *Lennon et al.*, a user can search or browse a database to access a metadata collection through a metadata server over a network connection. *Lennon et al.* merely teaches communication with a managed object, while Applicants teach managing the managed object. Management of a managed object is different from mere communication with a managed object. The aspect of management of a managed object clearly implies changing altering existing data of the managed object, and creation of new data associated with the managed object.

Furthermore, the Examiner acknowledges that *Lennon et al.* does not teach the element of Applicants' claimed SET command. The Examiner employs *Dickman et al.* to teach this omitted element. However, like *Lennon et al.*, *Dickman et al.* does not teach managing a managed object in the form of modifying existing parameters or creating new data. Rather, *Dickman et al.* pertains to employing shortcuts to facilitate browsing and searching over a network. The SET URL command of *Dickman et al.* does not support modifying parameters of any hardware device or managed object. Accordingly, it is Applicants' position that *Dickman et al.* fails to teach Applicants' claimed elements not met by *Lennon et al.*

The difference between managing a hardware device, such as a managed object, as claimed by Applicants, and searching for multimedia data over a network, as shown in the prior art of *Lennon et al.*, is apparent. To establish a rejection under 35 U.S.C. §103(a), all the claim limitations must be taught or suggested in the prior art.[1] If the prior are references do not teach or suggest every claim limitation of the Applicants' invention, then they do not meet every requirement under 35 U.S.C. §103(a) and are not sufficient to uphold a rejection under 35 U.S.C. §103(a).[2] In the present case, as stated above, the major difference between Applicants' invention and *Lennon et al.* and *Dickman et al.*, is that Applicants are managing a hardware device, including changing data of the device itself. See Applicants' amended independent claims. Neither *Lennon et al.* nor *Dickman et al.* teach or suggest managing a hardware device. Both of these prior art references teach software relates issues, including access to multimedia content and creating a shortcut key on a desktop browser. The prior art references do not teach

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[1] MPEP §2143.03 (Citing *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)).

[2] See MPEP §2143.

every element of Applicants' claimed invention. The *Lennon et al.* and *Dickman et al.* individually or when combined are not sufficient to uphold a rejection under 35 U.S.C. §103(a) since individually or in combination they fail to teach all of the elements claimed by Applicants. Accordingly, Applicants respectfully contend that the combination of *Lennon et al.* and *Dickman et al.* do not meet the standard set by the CAFC's interpretation of 35 U.S.C. §103(a), and respectfully request that the Examiner remove the rejection and direct allowance of claims 1-14 and 16-20.

II.   Conclusion

Applicants believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. Applicants are not conceding in this application that the prior condition of these claims are not patentable over the art cited by the Examiner, as the present claim amendments and cancellations are only for facilitating expeditious prosecution of the pending application. Applicants respectfully reserve the right to pursue these and other claims in one or more continuations and/or divisional patent applications. Accordingly, Applicants request that the Examiner indicate allowability of claims 1-14 and 16-20, and that the application pass to issue. If the Examiner believes, for any reason, that personal communication will expedite prosecution of the application, the Examiner is hereby invited to telephone the undersigned at the number provided.

For the reasons outlined above, withdrawal of the rejection of record and an allowance of this application are respectfully requested.

Respectfully submitted,

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